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10 Mitchell Taylor Button and Dusty Button

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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 SAGE HUMPHRIES, GINA MENICHINO,
16 ROSEMARIE DeANGELO, DANIELLE
17 GUTIERREZ, and JANE DOE 100,

18 Plaintiffs,
19 v.
20 MITCHELL TAYLOR BUTTON and
21 DUSTY BUTTON
22 Defendants.

23 Case No. 2:21-cv-01412-APG-VCF

24
25 **STIPULATION TO EXTEND DEADLINE**
FOR DEFENDANTS TO FILE
RESPONSIVE PLEADING TO
AMENDED COMPLAINT AND TO
EXTEND DEADLINE FOR PLAINTIFFS
TO FILE A RESPONSE

26 [First Request]

27 Pursuant to LR IA 6-2 and LR 7-1, Plaintiffs Sage Humphries, Gina Menichino, RoseMarie DeAngelo, and Danielle Gutierrez (“Plaintiffs”), and Defendants Mitchell Taylor Button and Dusty Button (“Defendants”), by and through their respective counsel of record, hereby stipulate and request that this Court extend the date by which Defendants may respond to Plaintiffs’ First Amended Complaint (ECF No. 18) until November 16, 2021.

In support of this Stipulation, the Parties state as follows:

- 24 1. Plaintiffs filed this action on July 29, 2021. *See* ECF No. 1.
- 25 2. Defendant Mitchell Taylor Button was served with process in this suit on July 29, 26 2021. *See* ECF No. 8; Fed. R. Civ. P. 12(a)(1)(A)(i).

1 3. Defendant Mitchell Taylor Button filed a Motion to Dismiss on September 9, 2021.

2 *See ECF No. 17.*

3 4. Plaintiffs then filed their First Amended Complaint on September 23, 2021. *See*
4 *ECF No. 18.* This mooted Mr. Button's Motion to Dismiss. *See ECF No. 22.*

5 5. RoseMarie DeAngelo and Danielle Gutierrez are parties added as Plaintiffs in the
6 First Amended Complaint (*ECF No. 18*).

7 6. Dusty Button is a party added as Defendant in the First Amended Complaint (*ECF*
8 *No. 18*).

9 7. Counsel for the Parties met and conferred and agreed to extend the date by which
10 Defendants must file their response to Plaintiffs' First Amended Complaint by 60 days, from
11 October 7, 2021, until December 6, 2021.

12 8. In exchange, should Defendants file a motion in response to the First Amended
13 Complaint, Counsel for the Parties agreed to extend the date by which Plaintiffs must file their
14 opposition to that motion by 60 days, until February 4, 2022.

15 9. Good cause exists to extend the time by which Defendant may respond to Plaintiffs'
16 Complaint because additional Defendant Dusty Button has only recently retained counsel and
17 requires additional time to examine the facts and circumstances of the case before preparing and
18 filing a responsive pleading.

19 10. Additionally, the First Amended Complaint is 53 pages long with 509 paragraphs
20 and 37 Claims for Relief, necessitating extra time for the parties to prepare necessary responses.

21 Accordingly, the Parties hereto stipulate and agree that the date by which Defendants shall
22 file their response to Plaintiffs' Complaint is extended by 60 days until December 6, 2021, and the
23 Parties hereto stipulate and agree that the date by which Plaintiffs shall file their response to
24 Defendants' Response to Plaintiffs' First Amended Complaint is extended by 60 days until
25 February 4, 2022.

1 IT IS SO STIPULATED.
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Dated: October 6, 2021.

Respectfully Submitted,

/s/ Ronald D. Green

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Respectfully Submitted,

/s/ Sigrid McCawley

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Attorneys for Plaintiffs

IT IS SO ORDERED:

DATED:


UNITED STATES MAGISTRATE JUDGE

10-13-2021

1 Case No. 2:21-cv-01412-APG-VCF
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3 **CERTIFICATE OF SERVICE**
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5 I HEREBY CERTIFY that on October 6th, 2021, I electronically filed the foregoing
6 document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy
7 of the foregoing document being served via transmission of Notices of Electronic Filing generated
8 by CM/ECF.
9

10 Respectfully submitted,
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12 /s/ Marc J. Randazza
13 Marc J. Randazza
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15 RANDAZZA | LEGAL GROUP
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